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October 4, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”), in connection with the Court’s September 21, 2022 order holding that Kreindler & Kreindler LLP and John Fawcett “willfully breached the Court’s protective orders.” ECF No. 8544, at 64. The order directed “Kreindler & Kreindler and Saudi Arabia . . . to meet and confer and reach agreement on a reasonable fee award” and stated that, “[i]f the parties cannot reach agreement, any motion for attorneys’ fees shall be filed within two weeks of the filing of this Order.” *Id.*

Counsel for Saudi Arabia and Kreindler & Kreindler have begun the meet-and-confer process. Given the Yom Kippur holiday, which begins this evening, the parties have been unable to complete that process. To allow the parties to continue to meet and confer, Saudi Arabia respectfully requests an extension of the deadline to file a motion for attorneys’ fees and costs until Wednesday, October 12, 2022. Counsel for Kreindler & Kreindler has informed us that they do not oppose this request.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)